IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application Number	:	10/830,114	Confirmation No.:	9022
Applicant	:	Margaret S. Brenner		
Filed	:	4/23/2004		
Title	:	**System and Method for Management and Delivery of Content and Rules**		
TC/Art Unit	:	3629		
Examiner:	:	Candice D. Carter		
Docket No.	:	J47004.000267		
Customer No.	:	**70813**		

Mail Stop APPEAL BRIEF – PATENTS
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

RESPONSE TO NOTIFICATION OF NON-COMPLIANT APPEAL BRIEF

Dear Sir:

This communication is responsive to the Notification of Non-Compliant Appeal Brief mailed October 29, 2009. The Notification asserted that the Appeal Brief did not provide a summary of each independent claim involved in the appeal.

In accordance with MPEP, section 1205.03, when the Office holds the brief to be defective solely due to appellant's failure to provide a summary of the claimed subject matter as required by 37 CFR 41.37(c)(1)(v), an entire new brief need not, and should not, be filed. Rather, a paper providing a summary of the claimed subject matter as required by 37 CFR 41.37 (c)(1)(v) will suffice.

Appellants submit concurrently herewith replacement Section V of the Appeal Brief. The Board is requested to refer to the Appeal Brief submitted in its entirety dated September 30, 2009.

AMENDMENT TO THE BRIEF

V. SUMMARY OF CLAIMED SUBJECT MATTER

The present invention, as set forth in the claims and as described in the specification of the above-identified patent application, is directed to a system and method for managing communications for an organization such that content, data, and rules can be delivered to multiple presentation channels in a media independent format. The content and data are combined at the presentation channels based on the rules at the presentation channels in order to deliver communications having specific content and physical layout.

Claim 1 defines a computer-implemented method for management and delivery of content and rules. The method comprises managing, for an organization, a plurality of data and a plurality of content in separate database entities (***Step 104, page 8, line 23 – page 9, line 4***). The managing is accomplished using a computer processor and the plurality of content is associated with the plurality of data based on a plurality of rules, the plurality of rules controlling a logical combination and physical layout of the plurality of data and plurality of content. (***Step 104 and page 9, line 18 through page 10, line 2***). The method further includes packaging, using the computer processor, the plurality of rules with the plurality of content in a carrier that is independent from multiple presentation channels (***Step 110, page 10, lines 20 through page 11, line 2***), wherein at least part of the plurality of content is integrated with at least part of the plurality of data (***Step 106 and page 10, line 4, through page 10, line 8***). The method further comprises delivering the plurality of data and the carrier to the multiple presentation channels (***Step 112, and page 10, line 20 through page 11, line 2***) and integrating, using processing tools at the multiple presentation channels, the plurality of data with the plurality of content based on the plurality of rules in order to logically integrate the data and content and control the physical layout of the integrated data and content (***Step 114, page 11, lines 4-11 and page 9, lines 21 and***

22). The method of claim 1 additionally includes distributing the integrated data and content through the multiple presentation channels (***Step 116, page 11, lines 12-19***).

Claim 16 defines a system for management and delivery of content and rules. The system (***See Fig. 3***) comprises at least one first database entity (***310, 312, 314, page 13, lines 24 and 25 of specification***) that manages a plurality of data and at least one second database entity (***306, page 13, line 3***) that manages a plurality of content. The plurality of content is associated with the plurality of data based on a plurality of rules (***308, page 13, lines 21 and 22***). The plurality of rules controls a logical combination and physical layout of the plurality of data and plurality of content (***See page 9, lines 19-22***). The system further includes a processor module, a delivery module (***302, See page 14, lines 1-6***) and multiple presentation channels (***316, 318, 320, and 322, See page 13, lines 15 and 16***). The processor module packages the plurality of rules with the plurality of content in a carrier that is independent from the multiple presentation channels (***Step 110, page 10, lines 20 through page 11, line 2***), wherein at least part of the plurality of content is integrated with at least part of the plurality of data. ***(Step 106 and page 10, line 4, through page 10, line 8).*** The delivery module delivers the plurality of data and the carrier to the multiple presentation channels. (***Step 112, and page 10, line 20 through page 11, line 2***). The multiple presentation channels integrate the plurality of data with the plurality of content based on the plurality of rules in order to logically integrate the data and content and control the physical layout of the integrated data and content, and distribute the integrated data and content ***Step 114, page 11, lines 4-11 and page 9, lines 21 and 22***).

Claim 31 defines a system (***See Fig. 3***) for management and delivery of content and rules. The system comprises means for managing, for an organization, a plurality of data and a plurality of content in separate database entities (***310, 312, 314, page 13, lines 24 and 25 of***

specification *and* ***306, page 13, line 3***), wherein the plurality of content is associated with the plurality of data based on a plurality of rules (***308, page 13, lines 21 and 22***), the plurality of rules controlling a logical combination and physical layout of the plurality of data and plurality of content (***See page 9, lines 19-22***). The system additionally comprises means for packaging the plurality of rules with the plurality of content in a carrier (***302, See page 14, lines 1-6***) that is independent from multiple presentation channels (***316, 318, 320, and 322, See page 13, lines 15 and 16***), wherein at least part of the plurality of content is integrated with at least part of the plurality of data (***Step 106 and page 10, line 4, through page 10, line 8***). The system further comprises means for delivering the plurality of data and the carrier to the multiple presentation channels (***Step 112, and page 10, line 20 through page 11, line 2***). Additionally, the system includes means for integrating, at the multiple presentation channels, the plurality of data with the plurality of content based on the plurality of rules in order to logically integrate the data and content and control the physical layout of the integrated data and content (***Step 114, page 11, lines 4-11 and page 9, lines 21 and 22***) and means for distributing the integrated data and content through the multiple presentation channels (***Step 116, page 11, lines 12-19***).

Claim 32 defines a computer readable medium having code for causing at least one processor to manage and deliver content and rules. The computer readable medium comprises code adapted to manage, for an organization, a plurality of data and a plurality of content in separate database entities, (***Step 104, page 8, line 23 – page 9, line 4***), wherein the plurality of content is associated with the plurality of data based on a plurality of rules, the plurality of rules controlling a logical combination and physical layout of the plurality of data and plurality of content (***Step 104 and page 9, line 18 through page 10, line 2***). The computer readable medium further comprises code adapted to package the plurality of rules with the plurality of content in a

carrier that is independent from multiple presentation channels (***Step 110, page 10, lines 20 through page 11, line 2***), wherein at least part of the plurality of content is integrated (***Step 106 and page 10, line 4, through page 10, line 8***) with at least part of the plurality of data and code adapted to deliver the plurality of data and the carrier to the multiple presentation channels(***Step 112, and page 10, line 20 through page 11, line 2***). The computer readable medium additionally comprises code adapted to integrate, at the multiple presentation channels, the plurality of data with the plurality of content based on the plurality of rules in order to logically integrate the data and content and control the physical layout of the integrated data and content (***Step 114, page 11, lines 4-11 and page 9, lines 21 and 22***) and code adapted to distribute the integrated data and content through the multiple presentation channels (***Step 116, page 11, lines 12-19***).

Claim 33 defines a method for management and delivery of content and rules. The method comprises managing, for an organization, a plurality of data and a plurality of content in separate database entities. (***Step 104, page 8, line 23 – page 9, line 4***). The managing is accomplished using a computer processor. The plurality of data is associated with a plurality of products and a plurality of clients and the plurality of content is stored in at least one media-independent format (***Step 104 and page 9, line 18 through page 10, line 2***) and comprises at least one of a discrete text element, a compiled text element and a graphic element (***See page 8, line 24 – page 9, line 7***). The plurality of content is associated with the plurality of data based on a plurality of rules. The method additionally includes packaging, using the computer processor, the plurality of rules with the plurality of content in a carrier that is independent from multiple presentation channels, wherein at least part of the plurality of content is integrated with at least part of the plurality of data. (***Step 110, page 10, lines 20 through page 11, line 2***). The plurality of content is packaged based on an extensible markup language (XML) and the plurality

of rules are packaged based on an XSL transformations (XSLT) language. (***See page 10, lines 13-19***). The method additionally includes delivering the plurality of data and the carrier to the multiple presentation channels, wherein the multiple presentation channels comprise at least one of an Internet website, a printed communication, an electronic communication, a printed advertisement, a broadcast advertisement, a telemarketing script, an interactive voice response unit message, an automatic teller machine (ATM) message, and a display-board message (***Step 114, page 11, lines 4-11 and page 9, lines 21 and 22***). The method further includes integrating, using computer processing tools at the multiple presentation channels, the plurality of data with the plurality of content based on the plurality of rules and specific needs of the multiple presentation channels (***Step 114, page 11, lines 4-11 and page 9, lines 21 and 22***) and distributing the integrated data and content through the multiple presentation channels (***Step 116, page 11, lines 12-19***).

CONCLUSION

For the reasons given above, Appellants submit that the Appeal Brief submitted with regards to the instant application meets the requirements of 37 C.F.R. §41.37(c)(1)(v)).

Accordingly, Appellants hereby request consideration by the Board of Patent Appeals and Interferences.

Please charge any shortage in fees due in connection with the filing of this paper to Deposit Account No. 50-4494, and please credit any excess fees to the same deposit account.

Should the Examiner believe anything further is desirable in order to place the application in even better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the telephone number listed below.

Dated: November 23, 2009

Respectfully submitted,

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